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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MIGUEL S. STRASSNER,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01500-APG-NJK

**JOINT STIPULATION AND ~~(PROPOSED)~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND**

(Second Request)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from April 12, 2019 to **April 15, 2019**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) has been experiencing chronic migraines, which impairs her vision, throughout the week and has been on intermittent sick leave. Counsel attempted to diligently finalize her response by the filing deadline, but could not do so due to her migraines. Due to Counsel's ongoing health issues, Counsel respectfully requests additional time to respond to the issues raised in Plaintiff's Motion. Defendant

1 makes this request in good faith with no intention to unduly delay the proceedings. Defendant
2 apologizes for the belated request for extension, but had ongoing health issues and filed an extension
3 of time as soon as reasonably practicable. The parties further stipulate that the Court's Scheduling
4 Order shall be modified accordingly.

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6 Respectfully submitted,

7 Dated: April 12, 2019

/s/ Joshua Harris
(*as authorized by email on April 12, 2019)
JOSHUA HARRIS
Attorney for Plaintiff

10
11 Dated: April 12, 2019

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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18 **ORDER**

19 APPROVED AND SO ORDERED:

20 DATED: April 15, 2019



THE HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE